

**OMAN INSURANCE
MANAGEMENT SERVICES
LIMITED
ONLINE DATA
PROTECTION POLICY**

Confidential

OIMSL DATA PROTECTION POLICY

EFFECTIVE: JUNE 2025

OMAN INSURANCE MANAGEMENT SERVICES LIMITED and/or its affiliates and entities (collectively “OIMSL”, “we” or “us”) values your security and privacy. OIMSL is required to comply with DIFC Authority’s Data Protection Law, DIFC Law No. 5 of 2020 (the “DP Law”), and may for certain types of personal data processing, be subject to laws from other jurisdictions.

As such, it is the policy of OIMSL to respect the privacy of its website services and app users. In accordance with DIFC DP Law and, as applicable, our Terms and Conditions , OIMSL collects information about you when you use or access our websites, use OIMSL email addresses for contact purposes, or you avail of other web-based products, information or services such as the OIMSL wifi (collectively, the “Website Services”) as well as through other interactions and communications you have with us, such as through the OIMSL App (the “App”).

This online data protection policy (the “Policy”) sets out the basis on which any information, including any personal data, we collect from you, or you provide to us, will be processed by OIMSL. Each time you access or use the Website Services or provide us with information, by doing so you acknowledge the practices described in this Policy. For use of specific services, i.e., the OIMSL wifi, you may be asked to opt-in to our use of the information you submit there. Your rights described herein apply in these instances as well.

1. Scope and Application

This Policy applies to persons anywhere in the world who access or use OIMSL's Website Services or the App ("Users").

2. Collection of Information

Information you give us

This is personal data you give us by providing information or filling in forms on the App or any OIMSL owned Website Services, or by corresponding with us (for example, by telephone, e-mail or any other digital or electronic form). It includes for example information you provide when you contact us, register for newsletters or other subscription services, or download and register to use the App, search for the App in app stores (including but not limited to Apple App Store and Google Play Store), share data via the App's social media functions, and when you report a problem with the App, or any of our Website Services.

If you contact us, we will keep at least an electronic record of such correspondence, including personal information shared at that time, in order to reply or process it as per your request. The personal information you give us may include your name, address, e-mail address and phone number, certain device information, username, password, residential building, work address, photograph, and other information you choose to provide ("Personal Information" or "Personal Data").

The Website Services or App collect and process Personal Data in accordance with the DP Law and applicable laws, including for specific, lawful purposes explained herein or at the time of collection, or for the performance of tasks carried out in your interests or the legitimate interests of OIMSL.

The Website Services or App are not targeted, intended, or expected to be of use to children. Apart from providing information for specific services or purposes, as directed

by OIMSL processes, User-provided contributions of content or contact information regarding or about children are expressly prohibited.

Information we collect about you and your device

Each time you use our Website Services or App we may and often will automatically collect the following information:

- technical information, including the type of mobile device you use, a unique device identifier (for example, mobile network information, your mobile operating system, the type of mobile browser you use, device token, device type, time zone setting ("Device Information");
- details of your use of our Website Services or App including, but not limited to traffic data, weblogs and other communication data, and the resources that you access ("Log Information");
- location information if the Website Services or App uses GPS technology to determine your current location. If you wish to use the particular feature, you may be asked to opt-in to your data being used for this purpose.

If you do not wish to share certain data with us or do not want us to use / share it for certain purposes (to the extent possible, in accordance with applicable laws and information in this notice), you can alter your preferences at any time. Where applicable, please check with your device provider's instructions for further information about how to do this.

Other Information We May Collect Through Your Use of the Website Services or the App

When you use any Website Services or the App, we may collect Personal Data including demographic information, for example information that you submit, or that we collect, which may include, but is not limited to, post code, age/birth date, current residence, hometown, gender, username, mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, device location, IP address, SMS data, transaction information, business activities and services

/ distribution locations, browsing history information, searching history information, and registration history information ("Demographic Information").

3. Use of Personal Data

We may use Personal Data which you provide to us or we collect from you to:

- Provide, maintain, and improve our App and Website Services, including, for example, to facilitate payments, send receipts, provide products and services you request (and send related information about them), develop new features that will enhance your user experience and our efficiency, provide customer support to Users, authenticate users, and send administrative messages, whether information-only or required by applicable law;
- Perform internal regulatory, administrative and operational requirements, including, for example, to prevent fraud or abuse of our Website Services; to troubleshoot software bugs and operational problems; to conduct permitted data analysis, testing, and research; to ensure you and OIMSL are complying with internal or external legal requirements, including those that necessitate use of digital systems; and to monitor usage and activity trends;
- Send you communications we think will be of interest to you based on your previous interactions with us, including information about products, services, promotions, news, and OIMSL events, where permissible under [DIFC Laws](#) and [guidance](#), and according to any other applicable laws; and to process contest, sweepstake, or other promotion entries and fulfill any related awards;
- Notify you about changes to this Policy, or our App and Website Services;
- Allow you to participate in any interactive features of our App or Website Services;
- Keep our App and Website Services safe and secure; or
- Personalize and improve the Website Services, including to provide or recommend features, content, social connections, referrals, and advertisements, in accordance with your preferences, to the extent permissible by law.

4. Processing, Storage and Transfer of Personal Data

We will take all steps reasonably necessary to ensure your Personal Data is processed fairly and lawfully, in accordance with the DP Law, other applicable laws and this Policy. By submitting your Personal Data (including Log, Device and / or Demographic Information), we expect you to understand that such transfer, storing or processing in

order for OIMSL to perform its general administrative functions is necessary and will be done in a proportionate, lawful manner, including but not limited to responding to enquiries you raise via the App or Website Services, oversight of the business entities registered in DIFC's jurisdiction and maintaining contacts for future informational or promotional activities. Unless otherwise notified, OIMSL does not ordinarily rely solely on automated decision making when processing your Personal Data.

In order to conduct our operations or fulfil regulatory obligations, we must transfer the Personal Data described in this Policy to and from, and process and store it in, the United Arab Emirates, the UK or EU region and (where applicable or required) with processors in other countries, some of which may have less protective privacy laws than those where you reside. In all such cases, and generally for any processing operations, we take appropriate security measures to protect your Personal Data in accordance with this Policy.

To preserve the integrity of our databases, to carry out on-going Website Services or provide the App on behalf of all Users, for research, analytics and statistics purposes and to ensure compliance with applicable laws and regulations, we retain Personal Data submitted by Users for a reasonable length of time unless otherwise prescribed by applicable law.

OIMSL is not responsible for the accuracy of the information you provide, and will modify or update your Personal Data in our databases when you provide updated information or ad hoc upon your request, as further outlined below. We will erase or put beyond active use your Personal Data upon request, unless we are required to retain it in accordance with DIFC or other applicable laws or to perform agreed services, in which case we align with applicable principles such as purpose specification and data minimization.

If it is not disproportionate or prejudicial, and required beyond this policy's notices, we will contact you to let you know we are processing your personal information.

By accessing or using the App or Website Services to which this Policy applies, we can reasonably expect that you understand that all information submitted by you through

the App or Website Services or otherwise to OIMSL may be used by OIMSL to support these processing operations, in accordance with applicable laws and its policies.

5. Sharing of Personal Data

We may share Personal Data which we collect about you as described in this Policy or as described at the time of collection or sharing, including as follows:

Through Our Website Services or the App

We may share Personal Data which we collect about you as described in this Policy or as described at the time of collection or sharing, including as follows:

Through Our Website Services or the App

We may share your Personal Data:

- with third parties to provide you the requested services; or
- With third parties to provide you a service that you requested through a partnership or promotional offering made by a third party or us; or
- With third parties with whom you choose to let us share your Personal Data, for example other apps or websites that integrate with our API or Website Services, or those with an API or Service with which we integrate

Other Types of Data Sharing

We may share your Personal Data:

- With OIMSL parent company, subsidiaries and affiliated entities, to the extent permissible by law;
- With vendors, consultants, marketing and advertising partners, and other service providers who need access to such Personal Data to carry out work on our behalf or to perform a contract we enter into with them;
- If we otherwise notify you and you provide your affirmative opt-in to share your data, where needed;

- In response to a request for information by a competent authority or government entities if we determine that such disclosure is in accordance with, or is otherwise required by any applicable law, regulation, or legal process;
- With law enforcement officials, government entities or authorities, or other third parties as required by applicable law;
- With third parties in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company; or
- With third parties in an aggregated and/or anonymized or pseudonymized form that cannot reasonably be used to identify you

Government Data Sharing

In some circumstances we are legally obliged to share information with public authorities or law enforcement. For example, we may be required to provide information related to a court order or where we must cooperate with supervisory authorities in handling complaints or investigations. In any scenario, we'll attempt to satisfy ourselves that we have a lawful basis on which to share the information, document our decision making, and satisfy ourselves we have a legal basis on which to share the information.

We may also share information in the event of the non-payment including of a monetary penalty or court ordered costs. If the debt remains outstanding after the specified timeframe for payment, no payment plan is in place or an agreed payment plan is not being adhered to, we may initiate formal proceedings to recover the full amount of the unpaid penalty.

As a result, OIMSL will share Personal Data with the litigation and recovery specialists it instructs in order for them to identify assets and undertake recovery action through the courts.

6. Your Rights and Choices

Marketing and Preferences

OIMSL supports Users' legal rights to opt-in or subsequently opt-out of receiving communications from us and our partners. You have the option to ask us not to process your Personal Data for marketing purposes and to remove it from our database, to not receive future communications or to no longer receive our App or Website Services.

You may change your preferences at any time.

Please note that we may continue to send you transactional or service-related e-mails despite your desire to not receive promotional or marketing e-mail messages. Additionally, please note that if you elect to opt-out of or unsubscribe from receiving promotional or other similar e-mails or messaging from one of our Website Services or the App, you may continue to receive promotional emails from our other websites, providers, or other, non-affiliated marketers whose services you may have accessed via OIMSL Website Services or App.

Finally, while we may remove your individual contact information from our professional contacts database, please be aware that if such information is in a different, third party's marketing directory through your request or election, you will need to request removal with such third party directly.

Access to and Correction of Your Personal Information

You have the right to access information held about you. Your right of access can be exercised for any reason, at any time, in accordance with DIFC and other applicable laws.

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

You may also request that we restrict the processing of, erase, transfer the information you gave us from one organisation to another, or otherwise process your Personal

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Data in line with the relevant articles providing for such rights set out in the DP Law or other applicable laws.

Any access request generally comes at no cost to you and we must respond within one month unless provided otherwise by the DP Law or other applicable laws. We may, where permissible, impose a reasonable fee to meet any extraordinary administrative costs in providing you with details of the information we hold about you.

When you contact us about a potential Personal Data error or query, we will endeavor to confirm or verify the information in question, then correct verified inaccuracies and respond to the original inquiry. We will endeavor to send a correction notice to businesses or others whom we know to have received the inaccurate data, where required and / or appropriate. However, some third parties and third party sites may continue to process inaccurate data about you until their databases and display of data are refreshed in accordance with their update schedules, or until you contact them personally to ensure the correction is made in their own files.

As set out in Article 39 on the DP Law, we may not discriminate against you for exercising your rights by denying services or changing prices or quality of service, unless reasonable to do so in general, as objectively determined, and applicable to all individuals offered or receiving such benefits.

7. Security Precautions

OIMSL makes every effort to ensure that your Personal Data is secure on its system. OIMSL has staff dedicated to maintaining our data protection and security policies, periodically reviewing them and making sure that OIMSL employees are aware of our data protection and security practices. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, OIMSL cannot warrant or guarantee the security of any Personal Data you transmit to us, and you do so at your own risk.

OIMSL has established policies and procedures for securely managing information and protecting Personal Data against unauthorized access. We continually assess our data

privacy, information management and security practices. We do this in one or more of the following ways:

- Establishing policies and procedures for securely managing information;
- Limiting employee access to viewing only necessary information in order to perform his or her duties;
- Protecting against unauthorized access to Personal Data by using data encryption, authentication and virus detection technology, as required;
- Requiring service providers with whom we do business to comply with relevant data privacy legal and regulatory requirements;
- Monitoring our websites through recognized online privacy and security organizations;
- Engaging in regular third party audits of our policies and practices; and
- Conducting background checks on employees and providing training to our employees.

If you have any further questions about our security and processing activities, please contact the OIMSL team. To the extent permitted by applicable law, OIMSL expressly disclaims any liability that may arise should any other third parties obtain the Personal Data you submit through fraud or otherwise where it is no fault of OIMSL.

8. Cookies

A cookie is a small text file that is unique to the web browser on your computer or mobile device, which is used to retain user preferences, and enhance browsing experience ("Cookie"). OIMSL uses Cookies to track overall site usage and enables us to provide a better user experience. We do not use Cookies to "see" other data on your computer or determine your email address.

Types of cookies we drop and the information collected using them include but are not necessarily limited to:

Essential Cookies

Site Analytics Cookies

Customer Interaction Cookies

Advertising Cookies

Most browsers accept and maintain Cookies by default. The DIFC Data Protection Law requires that OIMSL entities set such collection methods to collect the bare minimum, necessary cookies in order to operate the relevant website or app. Check the 'Help' or 'Settings' menu of your browser to learn how to change your Cookie preferences. You can choose to alter Cookies settings related to the use of our Website Services, but this may limit your ability to access certain areas of the Website.

Alternatively you may wish to visit an independent source of information, www.aboutcookies.org, which contains comprehensive information on how to alter settings or delete Cookies from your computer as well as more general information about Cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual or network operator for advice.

9. External Links

The Website and the App may contain links to other websites on the Internet that are owned and operated by third parties (the "External Sites"). These links are provided solely as a convenience to you and not as an endorsement by OIMSL of the contents of or reliability on such External Sites. You acknowledge that OIMSL is not responsible for the availability of, or the information and content of any External Site. You should contact the site administrator or webmaster for those External Sites if you have any concerns regarding such links or the content located on such external Sites.

If you decide to access linked third party websites, you do so at your own risk. OIMSL does not accept liability, and shall not be liable to you for any loss or damage arising from or as a result of your acting upon the content of another website to which you may link from the Website Services or the App.

10. Buildings Security and Contents

Building security records containing sign in and sign out information collected at the time of visiting and departing OIMSL offices will be maintained in accordance with this the applicable building management policy.

To the extent permitted by applicable law, OIMSL is not responsible for any contents, whether or not they contain Personal data or other business information, that remain in our premises after you leave OIMSL offices.

11. Changes to this Policy

OIMSL may change this Policy from time to time and without notice. If we make significant changes in the way we treat your Personal Data, or to the Policy, we will endeavor to provide you notice through the App or Website Services or by some other means, such as email. Your continued use of the App or Website Services after such notice constitutes your understanding of the changes. We encourage you to periodically review this Policy for the latest information on our privacy practices. We provide links to it through:

- The App or Website Services
- Referencing it in our Terms of Use
- Incorporating it into our contracts, agreements, and other documents as necessary or appropriate

Contact Us

If you have any questions, comments and requests related to this Policy, or if you have any complaints related to how OIMSL processes your personal data, please contact:

Data Protection Officer, Sukoon Insurance PJSC, P.O.Box 5209 Dubai UAE.

Email : dpo@sukoon.com ; Contact : 042337777

You may also contact the DIFC Commissioner of Data Protection's Office at:

Dubai International Financial Centre Authority

Level 14, The Gate Building

+971 4 362 2222

commissioner@dp.difc.ae

OIMSL has appointed a Data Protection Officer. The DPO may be contacted using the above address or telephone number, or via email at dpo@sukoon.com